

Renee Mazar
J.B.Poindexter and Company, Inc.
d.b.a Leer Midwest
58288 Ventura Drive
Elkhart, IN 46517-9497

Re: 039-10828
Minor Source Modification to:
Part 70 permit No.: T039-7561-00097

Dear Renee Mazar:

J.B.Poindexter and Company, Inc. d.b.a Leer Midwest was issued Part 70 operating permit T039-7561-00097 on March 22, 1999 for a fiberglass truck cap manufacturing plant. An application to modify the source was received on April 1, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Greg Wingstorm
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Minor Source Modification.

Source Background and Description

Source Name:	J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest
Source Location:	58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	T039-7561-00097
Operation Permit Issuance Date:	March 22, 1999
Minor Source Modification No.:	039-10828-00097
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest relating to the construction of the following emission units and pollution control devices:

- (a) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

History

On April 01, 1999, J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest submitted an application to the OAM requesting to add an additional injection molding machine to their existing plant. J. B. Poindexter & Company, Inc., dba Leer, Inc.,dba Leer Midwest was issued a Part 70 permit on March 22, 1999.

Source Definition

This manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers manufacturing plant consists of three (3) plants:

- (1) Plant 1 and Plant 2 are located at 58288 Ventura Drive; and
- (2) Plant 3 is located at 28858 Ventura Drive.

Since the three (3) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. For tracking purposes, these three (3) plants have been assigned Plant ID No. 039-00097.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

There are no stacks associated with this equipment

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 01, 1999. Additional information was received on May 19, 2000.

Emission Calculations

See Appendix A page 1 of 1 of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO ₂	-
VOC	61.72
CO	-
NO _x	-
Combination of HAPs	negligible

The two resins that are mixed to form the injection molding product, contain at least 85% Dicyclopentadiene which is not a HAP substance. Hence this modification has negligible HAP emissions.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)”. Modifications for which the potential to emit is limited to less than twenty-five (25) tons per year of any regulated pollutant.... by complying with one... limiting annual ...maximum volatile organic compound content.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for the Part 70 Operating Permit T039-7561-00097, issued to this source.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
reactive injection molding unit	-	-	-	<25	-	-	neg.
Total	-	-	-	<25	-	-	neg.
PSD Significant	250	250	250	250	250	250	neg.

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The VOC emissions from reactive injection molding unit is limited to less than 25 tons/yr, therefore, 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities) requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities)

- (a) Since the reactive injection molding process was constructed after January 1, 1980 and the potential to emit VOC from the mixing vessel is limited to less than 25 tons per year, the requirements of 326 IAC 8-1-6 does not apply. The input of volatile organic compounds delivered to the reactive injection molding process shall be limited, in total, to less than 25 tons per year rolled on monthly basis. This will be equivalent to VOC emission of less than 25 tons per year. Compliance with this limit for the injection molding process shall be determined based upon the following criteria:

Monthly usage by weight, monomer content for each resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each resin, and summing the emissions for all resins. Emission factors shall be based on the AP-42 document.

- (b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 25 tons VOC per year, shall require the approval of a Best Available Control Technology (BACT) plan, pursuant to 326 IAC 8-1-6, before such change may occur.

326 IAC 2-4.1 (New Source Toxic Controls)

- (a) Since the reactive injection molding process was constructed after July 27, 1997 and the potential to emit single HAP and combination of HAPs is less than 10 tons per year and 25 tons per year respectively, the requirements of 326 IAC 2-4.1 do not apply.
- (b) Any change or modification in the equipment covered in this permit which may increase the single HAP or combinations HAPs potential to emit to 10 tons or 25 tons per year respectively, shall require the approval of a Maximum Available Control Technology (MACT) plan, pursuant to 326 IAC 2-4.1-1, before such change may occur.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-10828-00097.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) one (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of Tonneau Caps at the rate of 10 units per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

- (a) The input of volatile organic compounds delivered to the reactive injection molding unit shall be limited, in total, to less than 25 tons per year rolled on a monthly basis. This will be equivalent to VOC emission of less than 25 tons per year.
- (b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 25 tons VOC per year, shall require the approval of a Best Available Control Technology (BACT) plan, pursuant to 326 IAC 8-1-6, before such change may occur.

D.4.2 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control):

- (a) Any change or modification in the equipment covered in this permit which may increase the potential to emit of single HAP and combination of HAPs to more than 10 tons and 25 tons per year respectively, shall require the approval of a Maximum Achievable Control Technology (MACT) plan, pursuant to 326 IAC 2-4.1-1, before such change may occur.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limit specified in Conditions D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated at the end of each quarter based on the total volatile organic compound usage for the most recent 12 consecutive month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.5 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

- (1) The amount and VOC content by weight of each resin used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP/HAPs usage limits and/or the HAP/HAPs emission limits established in Conditions D.4.2.
- (1) The amount and HAP/HAPs content of each raw material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted HAP/HAPs content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total HAP/HAPs usage for each month; and
 - (6) The weight of HAP/HAPs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: J.B. Poindexter & Company, Inc., dba Leer, Inc., dba Leer Midwest
Source Address: 58288 Ventura Drive and 28858 Ventura Drive, Elkhart, Indiana 46517
Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517
Part 70 Permit No.: T039-7561-00097
Facility: Reactive Injection Molding Unit
Parameter: Volatile Organic Compounds
Limit: less than 25 tons per 12 consecutive months period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Fiberglass Processes

Company Name: J. B. Poindexter & Company, Inc., dba Leer, Inc.,
Address City IN Zip: 58228 Ventura Drive, Elkhart, Indiana
CP: 039-10828
Plt ID: 039-00097
Reviewer: Gurinder Saini
Date: 11-Dec-00

Material	Density (lb/gal)	Weight % Monomer	Gallons per unit	Units per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Emission Factor (Flash off)	Transfer Efficiency
Resin A	8.11	85.0%	5.110000	10.00	7.05	169.08	30.86	0.00	2%	100%
Resin B	8.11	85.0%	5.110000	10.00	7.05	169.08	30.86	0.00	2%	100%
Totals:					14.09	338.17	61.72	0.00		

METHODOLOGY

Potential VOC Pounds per Hour = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor

Potential VOC Pounds per Day = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor

Potential VOC Tons per Year = Density (lb/gal) * Weight % Monomer * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Worst Coating + Sum of all solvents used

Emission Factor for Hand Layup of resin NVS is 10%, VS is 7%, for Spray Layup of resin NVS is 13%, VS is 9%

Emission Factor for Hand and Spray Layup of gelcoat NVS is 35%, VS is 25%

Emission Factors are from AP42, Fifth Edition (January 1995), Table 4.4-2

NVS = Non-vapor suppressed resin

VS = Vapor suppressed resin